

Isabelle Ord, Cal. Bar No. 198224 (*pro hac vice admitted*)
 E-mail: isabelle.ord@us.dlapiper.com
 Andrew Serwin, Cal. Bar No. 179493 (*pro hac vice admitted*)
 E-mail: andrew.serwin@us.dlapiper.com
 Jeffrey DeGroot, WSBA No. 46839 (*pro hac vice admitted*)
 E-mail: jeffrey.degroot@us.dlapiper.com
 DLA PIPER LLP (US)
 555 Mission Street
 San Francisco, California 94105-2933
 Tel: 415.836.2500
 Fax: 415.836.5201

Jennifer K. Hostetler, SBN 11994
 E-mail: jhostetler@lewisroca.com
 LEWIS ROCA ROTHGERBER CHRISTIE
 3993 Howard Hughes Parkway, Suite 600
 Las Vegas, Nevada 89169-5996
 Tel: 702.474.2624

Attorneys for Defendants
 FARMERS GROUP, INC., FARMERS INSURANCE EXCHANGE, and
 TRUCK INSURANCE EXCHANGE

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

RONALD STALLONE, on behalf of himself
 and all other persons similarly situated,

Plaintiff,

v.

FARMERS GROUP, INC., a Nevada
 Corporation; FARMERS INSURANCE
 EXCHANGE; and 21st CENTURY
 INSURANCE COMPANY,

Defendants.

Case No. 2:21-cv-01659-GMN-VCF

**STIPULATION AND ~~PROPOSED~~
 ORDER FOR EXTENSION OF CASE
 DEADLINES**

(FIRST REQUEST)

Plaintiff Ronald Stallone and Defendants Farmers Group, Inc., Farmers Insurance
 Exchange, and 21st Century Insurance Company (together, the “Parties”), by and through their
 respective counsel of record, hereby respectfully submit this Stipulation and Proposed Order to
 Extend Case Deadlines, which seeks an extension of the case deadlines by approximately 180
 days. Good cause exists for this extension because despite good-faith and reasonable diligence,

the Parties require additional time to complete discovery in this putative nationwide class action. This is the first request for extension of the case deadlines in this matter.

EFFORTS TO COMPLETE DISCOVERY

This is a putative nationwide class action arising from a 2021 security incident in which unknown cybercriminals targeted insurance company websites across the industry that offer online automobile insurance quotes. Since the Court's November 14, 2022 Order Granting Discovery Plan and Scheduling Order, the Parties have diligently engaged in discovery by exchanging written discovery requests (requests for production and interrogatories), negotiating appropriate search terms and custodians, and drafting an ESI Stipulation and Stipulated Protective Order (which the Parties intend to file shortly). Despite these efforts, due to the complexity of the case and the scope of discovery, the Parties have reasonably concluded that additional time is required to complete discovery and bring dispositive motions.

GOOD CAUSE EXISTS TO EXTEND THE CASE DEADLINES

Good cause exists to extend case deadlines because, despite the Parties' diligence, additional time is required to finalize written discovery responses, review and produce documents, conduct any necessary third-party discovery, complete depositions, conduct expert discovery, and bring class certification and summary judgment motions.

The Parties hereby stipulate and agree to the following proposed deadlines:

Event	Existing Deadline	Proposed New Deadline
Expert disclosures (initial)	October 6, 2023	April 5, 2024
Expert disclosures (rebuttal)	November 17, 2023	May 17, 2024
Discovery cutoff date	December 15, 2023	June 21, 2024
Deadline for filing motion for class certification	February 9, 2024	August 9, 2024
Deadline for filing opposition to motion for class certification	Not set.	September 20, 2024

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Deadline for filing dispositive motions	February 9, 2024	September 20, 2024
Deadline for filing reply in support of motion for class certification	Not set.	October 18, 2024
Pretrial order	March 8, 2024	November 15, 2024

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

IT IS SO AGREED AND STIPULATED:

Dated this 30th day of August 2023.

KIND LAW FIRM

LEWIS ROCA ROTHBERGER CHRISTIE LLP

By: /s/ Kate M. Baxter-Kauf

By: /s/ Jennifer K. Hostetler

Michael Kind, SBN 13903
Email: mk@kindlaw.com
8860 S. Maryland Parkway, Suite 106
Las Vegas, NV 89123
Tel: 702.337.2322

Jennifer K. Hostetler, SBN 11994
3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169-5996
Tel: 702.474.2687

CASEY GERRY SCHENK FRANCAVILLA

BLATT & PENFIELD, LLP

Gayle M. Blatt (CA #122048)
(*pro hac vice admitted*)

Email: gmb@cglaw.com

110 Laurel Street
San Diego, CA 92101

Tel: 619.238.1811

Fax: 619.544.9232

LOCKRIDGE GRINDAL NAUEN P.L.L.P.

Kate M. Baxter-Kauf* (MN #0392037)
(*pro hac vice admitted*)

Email: kmbaxter-kauf@locklaw.com

Karen Hanson Riebel (MN #0219770)
(*pro hac vice admitted*)

Maureen Kane Berg (MN #033344X)

(*pro hac vice admitted*)

Email: mkberg@locklaw.com

100 Washington Avenue St., Ste. 2200

Minneapolis, MN 55401

Tel: 612.339.6900

Fax: 612.339.0981

DLA PIPER LLP (US)

Isabelle Ord, (CA #198224)

(*pro hac vice admitted*)

Email: Isabelle.ord@us.dlapiper.com

Andrew Serwin (CA #179493)

(*pro hac vice admitted*)

Email: andrw.serwin@us.dlapiper.com

Jeffrey DeGroot, WSBA #46839

(*pro hac vice admitted*)

Email: Jeffrey.degroot@us.dlapiper.com

555 Mission Street

San Francisco, CA 94105-2933

Tel: 415.836.2500

Fax: 415.836.5201

Attorneys for Defendants

*Farmers Group Inc., Farmers Insurance
Exchange, and 21st Century Insurance
Company*

Attorney for Plaintiff Stallone and the Class

IT IS ORDERED.



United States District Judge
Magistrate

9-14-2023

DATED: _____